

BROWN & CONNERY, LLP

William M. Tambussi, Esquire

Alyssa I. Lott, Esquire

360 Haddon Avenue

P.O. Box 539

Westmont, New Jersey 08108

(856) 854-8900

Attorneys for Intervenor, Camden County Democratic Committee

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ANDY KIM, in his personal capacity as
a candidate for U.S. Senate, et al.,

Plaintiffs,

v.

CHRISTINE GIORDANO HANLON,
in her official capacity as Monmouth
County Clerk, et al.,

Defendants.

Case No.: 3:24-cv-01098-ZNQ-TJB

**NOTICE OF MOTION FOR
PARTIAL SUMMARY
JUDGMENT**

TO: Clerk, United States District Court

District of New Jersey

Clarkson S. Fisher Building & U.S. Courthouse

402 East State Street

Trenton, New Jersey 08608

Honorable Zahid N. Quraishi, U.S.D.J.

United States District Court

District of New Jersey

Clarkson S. Fisher Building & U.S. Courthouse

402 East State Street

Court Room 4W

Trenton, New Jersey 08608

ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that Intervenor, Camden County Democratic Committee (“CCDC”), by and through its counsel, Brown & Connery, LLP, shall move for an order granting its Motion for Partial Summary Judgment and dismissing Plaintiffs’ claim for an award of attorneys’ fees and costs from Intervenor CCDC.

PLEASE TAKE FURTHER NOTICE that Camden County Democratic Committee shall rely upon the accompanying Statement of Undisputed Material Facts in Support of its Motion, Brief in Support of its Motion, and Certification of Counsel. A proposed form of Order is also submitted herewith. Oral argument is requested if opposition is filed.

Respectfully submitted,

BROWN & CONNERY, LLP
*Attorneys for Intervenor, Camden
County Democratic Committee*

Dated: February 21, 2025

s/William M. Tambussi
William M. Tambussi